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June 28, 2023

VIA ELECTRONIC MAIL

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820

RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Attorney Simpson:

This confirms the results of our meet and confer held on June 27, 2023, as to the subpoena duces tecum to Saintnals.

I note your position is that it is untimely but when this case goes to trial I would be able to subpoena the information to trial. Further the return is only one (1) day after the close of discovery and the parties have agreed to additional depositions in August 2023.

Finally, I note that the day after discovery closed VVIC and VUSHC filed amended Rule 26 disclosures naming Saintnals as a potential witness in support of its defenses and denials specifically on the issue of damages.

Document Request No. 1: Requested Documents evidencing funds paid by you or received by you, for maintenance, special projects, and equipment rentals at the St. Croix or St. Thomas WAPA Propane Terminals from September 2022 to the present.

Saintnals position is that VVIC has this information, and its invoices are submitted to VVIC for payment. However, Plaintiff propounded a demand for production No. 6 to VVIC asking for all contracts and agreements with Saintnals

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and Defendant objected on the basis of relevancy and refused to produce the documents. Demand for Production No. 7 requested any documents or communications between VVIC and Saintnals regarding taking over the terminals and the prior terminal operations duties of IPOS/VHI. VVIC claimed this was irrelevant and refused to produce the documents.

As a result of VVIC representations that those documents were irrelevant Plaintiff did not serve a subpoena duces tecum on Saintnals drafted on and filed on June 24, 2022.

Further when it became clear that Saintnals did have relevant information Plaintiff reissued the subpoena returnable on June 26, 2023.

Document Demand No. 4: Requested any bids or documents related to how Saintnals, LLC came to be allowed to manage the WAPA St. Thomas and St. Croix Propane Terminals, or Propane Facilities, to include, but not be limited to, any contracts.

Again, Saintnals claims these documents can be received by VVIC.

Document Demand No. 5: Requested any maintenance, equipment rental, or project contract that Saintnals, LLC has entered into since it took over the propane terminals at WAPA facilities.

Again, Defendant claims these documents can be obtained through VVIC.

As such, we were unable to resolve these issues.

Cordially,



Lee J. Rohn

LJR/rn